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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

CARTER and EDALIA SULLIVAN,

Plaintiff,

vs.

SALLIE MAE BANK,

Defendant.

Case No.: 2:24-cv-02299-MDC

**STIPULATION AND ORDER  
TO EXTEND SALLIE MAE BANK'S  
TIME TO RESPOND TO SECOND  
AMENDED COMPLAINT**

**[First Request]**

IT IS HEREBY STIPULATED between Plaintiffs Carter and Edalia Sullivan ("Plaintiffs") and Defendant Sallie Mae Bank ("SMB") (collectively the "Parties"), by and through their undersigned counsel of record, as follows:

1. On July 19, 2025, Plaintiffs filed their Second Amended Complaint ("SAC") against SMB. [ECF No. 47].
2. The deadline for SMB to file a response to the SAC is currently August 4, 2025.
3. To allow SMB time to respond, investigate the revised allegations in the Second Amended Complaint and discuss same with counsel, the Parties agree to extend the deadline for SMB to file its response to the SAC through September 12, 2025.

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1 4. This is the Parties' first request to extend SMB's deadline to file a response to the SAC, and  
2 it is not intended to cause any delay or prejudice to any party.

3 **IT IS SO STIPULATED.**

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5 FREEDOM LAW FIRM

6 /s/ Gerardo Avalos

7 George Haines, Esq.  
8 Nevada Bar No. 9411  
9 Gerardo Avalos, Esq.  
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12 Las Vegas, Nevada 89123  
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14 *Edalia Sullivan*

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/s/ Robert A. Riether

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*Attorney for Defendant Sallie Mae Bank*

15 **ORDER**

16 **IT IS SO ORDERED.**

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20 Hon. Maximiliano D. Corvillier III  
21 United States Magistrate Judge  
22 Date: 8/1/2025  
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